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21 JOHNSTECH INTERNATIONAL CORP.

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA

24 JOHNSTECH INTERNATIONAL CORP.,

25 Plaintiff,

26 v.

27 JF MICROTECHNOLOGY SDN BHD,

28 Defendant.

CASE NO. 14-cv-02864 JD

**DECLARATION OF
DAN HALL IN OPPOSITION TO
DEFENDANT'S MOTIONS IN LIMINE
NOS. 1-8**

Date: June 15, 2016
Time: 3:00 p.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

29 I, Dan Hall, declare as follows:

30 1. I am over eighteen years of age and have personal knowledge of the facts stated in
31 this declaration. If called upon to do so, I could testify as to the matters set forth herein.

32 2. I am one of the attorneys representing Plaintiff Johnstech International Corp.
33 ("Johnstech") in this matter. I submit this declaration in opposition to Defendant's ("JFM")
34 Motions in Limine Nos. 1-8.

1 3. On January 6, 2016, JFM served a notice for the deposition of one of Johnstech's
2 experts, Mr. John Beck. When JFM was reminded that they would be required to pay for Mr.
3 Beck's time spent preparing for and testifying in deposition, JFM decided it would forgo the
4 deposition. Attached as **Exhibit 1** is a true and correct copy of Defendant's Notice of Deposition
5 of John Beck, dated January 6, 2016.

6 4. Attached as **Exhibit 2** is a true and correct copy of Plaintiff's Disclosure of
7 Asserted Claims and Infringement Contentions, dated December 19, 2014.

8 5. Attached as **Exhibit 3** is a true and correct copy of the Declaration of Michael
9 Andres, dated December 2, 2015.

10 6. Attached as **Exhibit 4** is a true and correct copy of the Expert Report on Damages
11 by John Beck, dated December 2, 2015. **This exhibit was designated "HIGHLY**
12 **CONFIDENTIAL –ATTORNEYS' EYES ONLY"** by both JFM and Johnstech under the
13 **Stipulated Protective Order.**

14 7. Attached as **Exhibit 5** is a true and correct copy of the Report on Testing of
15 Contactor Motion prepared by Stuart Brown, Ph.D., dated December 1, 2015.

16 9. Attached as **Exhibit 7** is a true and correct copy of a chart titled GM Calcs, bates
17 labeled JOHNSTECH005863. **This exhibit was designated "HIGHLY CONFIDENTIAL –**
18 **ATTORNEYS' EYES ONLY"** by Johnstech under the Stipulated Protective Order.

19 11. Attached as **Exhibit 9** is a true and correct copy of a chart titled 10/11/2012
20 Estimate (Concept 5B2, Dual Elastomer), produced by non-party Interconnect Devices, Inc.
21 ("IDI") and bates labeled IDI00001215 (Beard). **This exhibit was designated**
22 **"CONFIDENTIAL" by IDI under the Stipulated Protective Order.**

23 12. Attached as **Exhibit 10** is a true and correct copy of a chart titled 10/18/2012
24 Estimate (JTI PAD ROL200 Duplicate), bates labeled IDI00001216 (Beard). **This exhibit was**
25 **designated "CONFIDENTIAL" by IDI under the Stipulated Protective Order.**

26 13. Attached as **Exhibit 11** is a true and correct copy of an Archimedes Technology
27 slide produced by IDI, bates labeled IDI00001240 (Beard). **This exhibit was designated**
28

1 **“CONFIDENTIAL” by IDI under the Stipulated Protective Order.¹**

2 I declare under criminal penalty of perjury under the laws of the United States of America
3 that the foregoing is true and correct.

4 Dated: June 1, 2016

ANTHONY OSTLUND
BAER & LOUWAGIE P.A.

6
7 By: /s/ Daniel R. Hall

DANIEL R. HALL
Attorneys for Plaintiff
JOHNSTECH INTERNATIONAL CORP.

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25 _____
26 ¹ Exhibits 6 and 8 were removed after discussions between the parties aimed at reducing
27 duplicative exhibits being filed with the Court in support and opposition to these Motions in
28 Limine.